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*Counsel for Century Indemnity Company,
Pacific Indemnity Company, and
Westchester Fire Insurance Company*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

THE ROMAN CATHOLIC ARCHBISHOP
OF SAN FRANCISCO,

Debtor and
Debtor in Possession.

Bankruptcy Case
No. 23-30564 (DM)

Chapter 11

Jointly Administered

NOTICE OF APPEARANCE AND REQUEST
FOR SERVICE OF NOTICES AND
PLEADINGS

PLEASE TAKE NOTICE THAT Simpson Thacher & Bartlett LLP (“**Simpson Thacher**”) hereby appears in the above-captioned chapter 11 case as attorneys for Century Indemnity

1 Company, Pacific Indemnity Company, and Westchester Fire Insurance Company (collectively,
2 “Insurers”).

3 Pursuant to section 1109(b) of Title 11 of the United States Code (the “**Bankruptcy**
4 **Code**”) and Rules 2002, 3017(a) 9007, and 9010 of the Federal Rules of Bankruptcy Procedure
5 (the “**Bankruptcy Rules**”), Simpson Thacher requests that all notices given or required to be
6 given in these cases, and all papers served or required to be served in these cases, be given to and
7 served upon Simpson Thacher at the office, address and telephone number set forth below, and
8 that Simpson Thacher be added to the mailing matrix on file with the Clerk of the Bankruptcy
9 Court as follows:

10 Andrew T. Frankel, Esq.
Michael H. Torkin, Esq.
David Elbaum, Esq.
11 SIMPSON THACHER & BARTLETT LLP
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14 Pierce A. MacConaghy, Esq.
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19 Email: david.elbaum@stblaw.com
20 Email: pierce.macconaghy@stblaw.com

21 PLEASE TAKE FURTHER NOTICE THAT, pursuant to section 1109(b) of the
22 Bankruptcy Code, the foregoing request includes not only the notices and papers referred to in
23 the Bankruptcy Rules and sections specified above but also includes, without limitation, all
24 orders, notices, applications, complaints or demands, motions, petitions, pleadings or requests,
25 disclosure statements or plans of reorganization, whether formal or informal, written or oral, and
26 whether transmitted or conveyed by mail, electronic mail, hand or courier delivery, telephone,
27

1 telecopy, facsimile, telegraph or otherwise, in the above-referenced cases and proceedings
2 therein.

3 PLEASE TAKE FURTHER NOTICE THAT neither this Notice of Appearance and
4 Request for Service of Papers (this “**Notice**”), nor any subsequent appearance, pleading, proof of
5 claim, claim or suit is intended nor shall be deemed a waiver of any of the Insurers’ rights: (i) to
6 have final orders in non-core matters, or matters over which the Bankruptcy Court does not have
7 constitutional adjudicatory authority, entered only after *de novo* review by a District Judge for
8 the United States District Court for the Northern District of California (the “**District Court**”);
9 (ii) to trial by jury in any proceeding related to these chapter 11 cases or any case, controversy or
10 proceeding related hereto; (iii) to have the reference withdrawn by the District Court in any
11 matter subject to mandatory or discretionary withdrawal; (iv) to object to the jurisdiction of the
12 Bankruptcy Court for any purpose other than with respect to this Notice; (v) to an election of
13 remedy; or (vi) any other rights, claims, actions, defenses, setoffs or recoupments to which they
14 are or may be entitled under agreements, at law or in equity, all of which rights, claims, actions,
15 defenses, setoffs and recoupments expressly are hereby reserved.

16 Respectfully submitted,

17 Dated: October 13, 2023

18 /s/ Pierce A. MacConaghy

19 Pierce A. MacConaghy

20 Andrew T. Frankel

21 Michael H. Torkin

22 David Elbaum

23 SIMPSON THACHER & BARTLETT LLP

24 *Counsel for Century Indemnity Company,*
25 *Pacific Indemnity Company, and*
26 *Westchester Fire Insurance Company*